

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION

Alacia C. Quinton as PR for the	)	Civil Action No.: 1:10-cv-02187-JMC
Estate of April Lynn Quinton,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Toyota Motor Corporation, Toyota	)	<b>DEFENDANTS' RESPONSE TO</b>
Motor Sales U.S.A., Inc., Toyota	)	<b>PLAINTIFF'S MOTION <i>IN LIMINE</i></b>
Motor Engineering and	)	<b>NO. 12</b>
Manufacturing North America, Inc.;	)	
Toyoda Gosei North America	)	
Corporation,	)	
	)	
Defendants.	)	
	)	

---

Defendants, Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyota Motor Engineering and Manufacturing North America, Inc., and Toyoda Gosei North America Corporation (hereinafter "Defendants") consent to Plaintiff's Motion *In Limine* No. 12 as it relates to Defendants' experts, counsel, employees, or families. Defendants do not consent to this motion to the extent it applies to areas of potential cross-examination of Plaintiff's expert and fact witnesses and their family members. Whether Plaintiff's witnesses or their family members drive Toyotas is relevant to their credibility.

Respectfully submitted

BOWMAN AND BROOKE LLP

By: s/Richard H. Willis

Richard H. Willis

Federal Bar No. 4700

E-mail address:

[richard.willis@bowmanandbrooke.com](mailto:richard.willis@bowmanandbrooke.com)

Angela G. Strickland

Federal Bar No. 9824

E-mail address:

[angela.strickland@bowmanandbrooke.com](mailto:angela.strickland@bowmanandbrooke.com)

1441 Main Street, Suite 1200

Columbia, SC 29201

(803) 726-7420

*and*

Bard D. Borkon

*(Pro Hac Vice)*

E-mail address:

[bard.borkon@bowmanandbrooke.com](mailto:bard.borkon@bowmanandbrooke.com)

Bowman and Brooke LLP

150 South Fifth Street, Suite 3000

Minneapolis, MN 55402

Tel: 612-672-3241

Fax: 612-672-3200

Counsel for Defendants,

*Toyota Motor Corporation, Toyota Motor Sales,  
U.S.A., Inc., Toyota Motor and Manufacturing North  
America, Inc., and Toyoda Gosei North America  
Corporation*

Date: May 31, 2013